

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
2 Charles K. Verhoeven (Bar No. 170151)  
3 charlesverhoeven@quinnemanuel.com  
4 David A. Perlson (Bar No. 209502)  
5 davidperlson@quinnemanuel.com  
6 Melissa Baily (Bar No. 237649)  
7 melissabaily@quinnemanuel.com  
8 John Neukom (Bar No. 275887)  
9 johnneukom@quinnemanuel.com  
10 Jordan Jaffe (Bar No. 254886)  
11 jordanjaffe@quinnemanuel.com  
12 50 California Street, 22<sup>nd</sup> Floor  
13 San Francisco, California 94111-4788  
14 Telephone: (415) 875-6600  
15 Facsimile: (415) 875-6700

16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL ITS REPLY TO SPECIAL  
MASTER COOPER REGARDING  
UBER'S OBLIGATION TO PRODUCE  
JACOBS LETTER AND RELATED  
DOCUMENTS**

23 vs.

24 UBER TECHNOLOGIES, INC.;  
25 OTTOMOTTO LLC; OTTO TRUCKING  
26 LLC,

27 Defendants.

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Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal information in its Reply Submission to Special Master Cooper Regarding Uber’s Obligation to Produce Jacobs Letter and Related Documents (“Waymo’s Reply”), filed concurrently herewith. Specifically, Waymo requests an order granting leave to file under seal the portions of the documents as listed below:

<b>Document</b>	<b>Portions to Be Filed Under Seal</b>	<b>Designating Party</b>
Waymo’s Reply	Highlighted in blue	Defendants
Exhibit 17 to Waymo’s Reply	Entire document	Defendants
Exhibit 19 to Waymo’s Reply	Entire document	Defendants
Exhibit 20 to Waymo’s Reply	Entire document	Defendants
Exhibit 21 to Waymo’s Reply	Entire document	Defendants
Exhibit 22 to Waymo’s Reply	Entire document	Defendants
Exhibit 23 to Waymo’s Reply	Entire document	Defendants
Exhibit 24 to Waymo’s Reply	Entire document	Defendants

### I. **LEGAL STANDARD**

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

### II. **DEFENDANTS CONFIDENTIAL INFORMATION**

Waymo seeks to seal identified portions of these documents because Defendants have designated the information confidential and/or highly confidential. Declaration of Lindsay Cooper (“Cooper Decl.”) ¶ 3. Waymo takes no position on the merits of sealing the designated material, and expects Defendants to file one or more declarations in accordance with the Local Rules.

### III. **CONCLUSION**

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above listed documents accompany this Administrative Motion. For the foregoing reasons, Waymo respectfully requests that the Court grant Waymo’s Administrative Motion.

1 DATED: December 21, 2017

2 QUINN EMANUEL URQUHART & SULLIVAN,  
3 LLP

4 By /s/ Charles K. Verhoeven

5 Charles K. Verhoeven  
6 Attorneys for WAYMO LLC

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